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Projekt Bayern Association*

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

CITY OF LEAVENWORTH,
a Washington municipal corporation,

Plaintiff/Counterclaim
Defendant,

v.

PROJEKT BAYERN ASSOCIATION,
a Washington nonprofit corporation,

Defendant/Counterclaimant.

No. 2:22-cv-00174

**DECLARATION OF
LARRY LANGSTON**

I, Larry Langston, declare as follows:

1. I am over 18 years of age and competent to make the following
declaration based on my personal knowledge.

2. I lived in Leavenworth, Washington between 1978 and 2008. I served two terms on the Leavenworth City Council, and also served as Vice President of the Leavenworth Chamber of Commerce.

3. In approximately 1997, I helped form and became a member of Projekt Bayern, a civic club formed to promote Leavenworth's Old World Bavarian theme.

4. In 1998, Projekt Bayern originated the idea and hosted its first "Leavenworth Oktoberfest" celebration. The first several "Leavenworth Oktoberfest" celebrations were operated by Projekt Bayern on private property owned by the Nelson family. Once constructed, Projekt Bayern leased Festhalle for its "Leavenworth Oktoberfest" celebration. I was in charge of Projekt Bayern's "Leavenworth Oktoberfest" celebration in 2003 and 2004, and the City of Leavenworth had no role in operating the event whatsoever.

5. During my involvement with the “Leavenworth Oktoberfest” celebration, Projekt Bayern worked with the City of Leavenworth to obtain necessary permits and to lease event space, but Projekt Bayern never operated its “Leavenworth Oktoberfest” celebration at the request of the City of Leavenworth or on behalf of the City of Leavenworth. Projekt Bayern always operated “Leavenworth Oktoberfest” as its own event.

6. To my knowledge, the City of Leavenworth never operated any type of Oktoberfest event before 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9th day of September, 2022, at Las Cruces, New Mexico.

Larry Langston
LARRY LANGSTON

DECLARATION OF LARRY LANGSTON - 2

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CERTIFICATE OF SERVICE

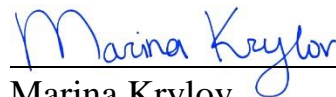
I hereby certify under penalty of perjury under the laws of the State of Washington that on the date written below, I caused a true and correct copy of the foregoing to be delivered to the following party in the manner indicated:

Name: Rhett V. Barney, WSBA #44764 ☒ Via Electronic Mail/ECF
Address: LEE & HAYES, P.C. ☐ Via U.S. Mail
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Attorneys for Plaintiff City of Leavenworth

DATED this 9th day of September, 2022.



Marina Krylov
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